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In The

Supreme Court of the United States

No. 71-108, 1971 Term

UNITED STATES OF AMERICA,
Appellant,

v.

FIRST NATIONAL BANCORPORATION, INC. AND THE FIRST NATIONAL BANK OF GREELEY,
Appellees.

On Appeal from the United States District Court for the District of Colorado

BRIEF AND APPENDIX AS AMICUS CURIAE FOR THE COMMONWEALTH OF VIRGINIA

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II.

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In The

Supreme Court of the United States

No. 71-103, 1971 Term

UNITED STATES OF AMERICA,
Appellant,

v.

FIRST NATIONAL BANCORPORATION, INC. AND THE FIRST NATIONAL BANK OF GREELEY,
Appellees.

On Appeal from the United States District Court
for the District of Colorado

BRIEF AS AMICUS CURIAE FOR THE COMMONWEALTH OF VIRGINIA

I.

INTEREST OF THE COMMONWEALTH OF VIRGINIA

The Commonwealth of Virginia files this brief as *Amicus Curiae* in the belief that her experience over the past decade may be of use to the Court in assessing the merits of this case. The thrust of appellant's case is that leading banks in the major markets in a state must not be permitted to acquire leading banks in local markets in that state because the effect of such acquisitions may be to substantially lessen competition in those markets by reducing new entrants. The experience of the Commonwealth in the ten years since

statewide banking was adopted is not consistent with this contention.

II.

ARGUMENT

A.

Recent Development Of Banking In Virginia

In December of 1960, there were 303 commercial banking organizations in Virginia. The five largest organizations controlled 27.5% of state deposit totals.[1] Early in 1971, the number of commercial banking organizations had dropped to approximately 180 and the five largest organizations had increased their share of state deposit totals to about 51.7%.[2] Over the same period, the number of competitive alternatives in the 50 largest cities rose from a total of 141 to 198, or an average of 2.82 to 3.96.[3] The market share of the leading bank in each of the major markets in the state has fallen sharply. The movement of the larger local banks in local markets into the holding company structure has, in our judgment, increased the competitive vigor of those banking markets.

The State Corporation Commission anticipated that the 1962 changes in state banking laws would lead to acquisitions of leading local banks in various parts of the state by the state's larger banking organizations, resulting in a

[1] Polk's Bank Directory, March 1961; 1960 Annual Report F.D.I.C., Moody's Bank and Finance Manual, 1961. Unlike Colorado, Virginia has several large population centers (e.g., Tidewater, Richmond and Northern Virginia) each of which developed as a major banking market. Thus the "concentration" ratios were naturally lower.

[2] American Bank Directory, Spring, 1971; F.D.I.C. records; Moody's Bank and Finance Manual, 1971.

[3] See Appendix Table 1. Many of the tables used herein are borrowed from the application for the formation of the holding company, Virginia National Corporation, filed September 1, 1971.

nificant increase in statewide concentration ratios. The ial purpose of such legislation was a stronger banking tem and a higher order of market competition in the mmonwealth. We believe that purpose has been ac-plished.

Prior to 1962 the activities of Virginia banking organiza-ns were largely restricted to their home cities.[4] In that r, state banking laws were enacted to broaden branching hority,[5] and, almost simultaneously, holding company anizations began to develop. Promptly after and as a ect result of these changes, a number of leading banks ocal markets throughout the state were acquired by the ger banking organizations in the state. As previously icated, the number of banking organizations in the state lined sharply as a result of this activity, and the share deposits in the state controlled by the largest organiza-ns rose significantly. Changes in concentration ratios, vever, are competitively significant only to the extent they reflect changes in the competitive alternatives ilable to consumers within a market. Virginia is not a king market. The 50 largest cities in Virginia (includes cities over 5,000 in 1970 population) had 134 total king alternatives available in 1950; 141 in 1960; and on January 1, 1971.[6] Thus, these cities had an average 2.68 banking organizations in 1950; 2.82 in 1960; and 5 at the beginning of 1971. The average number of king options available within the markets of the state e increased significantly over the same period that statewide number of banking organizations has de-

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Code of Virginia, 1950, §§ 6-26, 6-27, 6-27.2.

Acts, 1962, cc. 371 and 404; 1964 Cum. Supp. to Code of Virginia, § 6-26. For current law, see Code of Virginia, 1950 (1966 acement Volume) § 6.1-39.

See Appendix Table 1.

creased. State deposit "concentration" levels have increased significantly as well. Moreover, the extent of dominance of leading banks within these markets has been sharply curtailed from earlier levels. Compare:

City	Bank[1]	12/30 1950 Market %	6/30 1970 Market %
Norfolk	Virginia National Bank	63.2	54.1
Richmond	First & Merchants State Planters	70.2	57.7
Alexandria	First & Citizens	67.9	51.6
Newport News	First & Merchants	54.5	37.0
Lynchburg	First National Trust	45.3	34.0
Roanoke	First National Exchange	58.0	49.4

[1] Listed bank or predecessor.

Source: Distribution of Bank Deposits by Counties and Standard Metropolitan Areas, December 30, 1950, Federal Reserve Board; Polk's Bank Directory, March, 1951, and September 1970; Moody's Bank and Finance Manual, various editions; F.D.I.C. records.

A comparison of the performance of Virginia with other states in the number of competitive options available in the various size categories of cities shown above confirms that these developments in local markets are associated with the statewide developments which commenced in 1962, rather than reflecting general industry trends. In each category, Virginia now ranks substantially above the national average as shown below:[7]

[7] See Appendix Tables 4-7.

Average Number of Commercial Banking Organizations Per City in Cities of 5,000 to 49,999 Population in 1970 in the United States and in Virginia[1]

	Cities With 1970 Population Between:			
	5,000 and 9,999	10,000 and 14,999	15,000 and 29,999	30,000 and 49,999
ited States	1.99	2.41	2.83	3.29
rginia	2.41	3.33	3.20	5.00

[1]Includes all cities of 5,000 to 49,999 population located outside andard Metropolitan Statistical Areas.

Another performance measure which is a guide to the blic service afforded by the banks of a state is the ratio population per office. In 1950, there were 7,971 people r commercial banking office in the United States.[8] The rginia average was slightly less at 7,772. The national ure has been sharply reduced to 5,765 as of the end of ecember, 1970. Nevertheless with the statewide develop-nts previously noted, Virginia has bettered that perform-ce substantially and now stands at 4,394 per office, as own below:

	Dec. 30, 1950	Dec. 31, 1970
ited States (48 states and D.C.)		
Population	150,697,361	202,112,686
Banking Offices	18,905	35,057
Population Per Office	7,971	5,765
rginia		
Population	3,318,680	4,648,494
Banking Offices	427	1,058
Population Per Office	7,772	4,394
% Above or Below U.S.	—2.5%	—23.8%

urce: 1950 and 1970 Annual Report, F.D.I.C.; 1950 and 1970 Census of Population.

Coterminous U.S. (original 48 states and D.C.).

The comparative figures and the rate of change in this short span of time support the conclusion that the banking environment in Virginia has become more competitive than the nation as a whole, despite the increase in statewide concentration levels. An increase in statewide concentration levels is not undesirable where it can be shown, as in Virginia, that the greater concentration has resulted in increased local market alternatives. For example, a decrease from 50 to 10 in the number of banking organizations within a state is not an undesirable competitive development if each of the 50 previously had a monopoly position in its local market which is now being served by five or six of the present organizations.

B.

Continued Orderly Development Of Banking In Virginia

In the view of the Commonwealth this coalescence of banking resources in the State is desirable so long as it continues to provide increased local market alternatives. With its jurisdiction over the organization of new banks and the acquisition of existing banks by merger, the State Corporation Commission (and its federal regulatory counterparts) are able to prevent moves that adversely affect the competitive quality of banking markets throughout the State.

In this connection the Commonwealth disagrees with the view expressed by the Federal Deposit Insurance Corporation that the preservation or improvement of local competition receives "little attention" by state bank supervisors under "public convenience and needs" criteria.[9] In Virginia the State Corporation Commission gives considerable attention to the competitive implications of bank expansion cases. Moreover, we think the views of state bank supervisors as

[9] F.D.I.C. brief, p. 11.

to the probability that a new bank would be authorized in a particular market should be entitled to great weight. Who else is better qualified by experience and intimate knowledge of local conditions to make that judgment?

III.

CONCLUSION

In our experience the growth of statewide banking organizations has led to more competitive and healthier local banking markets. Under the control of the State Corporation Commission and appropriate federal counterparts there has been an orderly development of banking in Virginia, proving the wisdom of the policy adopted by the Commonwealth in 1962.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this 21st day of July I have delivered 40 copies of this brief to the clerk of the Supreme Court of the United States and mailed postage pre-paid 3 copies

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APPENDIX

TABLE 1

Cities Over 5,000 Population In 1970 In Virginia

Number of Commercial Banking Organizations in 1950, 1960 and 1971

Cities[1]	December 1950	June 1960	January 1971
Alexandria	4	4	10
Arlington	4	4	6
Bedford	2	2	2
Blacksburg	2	2	3
Bluefield	1	1	2
Bristol[2]	3	5	5
Buena Vista	2	2	3
Charlottesville	3	3	4
Chesapeake	1[3]	2[3]	7
Christiansburg	2	2	3
Clifton Forge	2	2	2
Colonial Heights	1	1	2
Covington	2	2	2
Culpeper	2	2	2
Danville	5	7	7
Emporia	2	2	2
Fairfax (City)	1	1	5
Falls Church	1	3	8
Franklin	2	2	2

TABLE 1—Continued

Cities[1]	December 1950	June 1960	Janu 19
Fredericksburg	2	2	
Front Royal	2	2	
Galax	2	2	
Hampton	5[4]	4	
Harrisonburg	3	3	
Hopewell	1	2	
Lexington	3	3	
Lynchburg	6	4	
Manassas	2	2[6]	
Marion	2	2	
Martinsville	2	3	
Newport News	5[5]	5	
Norfolk	5[7]	5	
Petersburg	3	3	
Poquoson	2[8]	2	
Portsmouth	4	5	
Pulaski	2	2	
Radford	2	2	
Richmond	11	9	
Roanoke	4	4	
Salem	2	2	
South Boston	2	2	
Staunton	5	4	

TABLE 1—Continued

Cities[1]	December 1950	June 1960	January 1971
Suffolk	3	3	4
Vienna	1	1	4
Vinton	1	1	3
Virginia Beach	2[9]	2[9]	7
Waynesboro	2	2	3
Williamsburg	1	2	2
Winchester	3	3	3
Wytheville	2	2	3
Total, above 50 cities	134	141	198

[1] All incorporated places over 5,000 population in 1970 and Arlington County (which is unincorporated).

[2] Bristol, Virginia and Tennessee combined.

[3] Includes Norfolk County (other than Tanners Creek district) and South Norfolk, which were combined in 1963 and named Chesapeake City.

[4] Includes Elizabeth City County which became part of Hampton in 1952.

[5] Includes Warwick County which became part of Newport News in 1958.

[6] Includes Manassas Park.

[7] Includes Tanners Creek district of Norfolk County which was annexed by Norfolk after 1950.

[8] Poquoson district of York County which became Poquoson City after 1950.

[9] Includes Princess Anne County which became part of Virginia Beach City in 1963.

[10] As of mid-1971.

Sources: Polks Bank Directory, March 1951 and September 1960. American Bank Directory, Spring 1971; FDIC records; Moody's Bank and Finance Manual, 1951, 1961 and 1971. Commercial Atlas and Marketing Guide, 1970, Rand McNally & Co.

TABLE 2

Cities Over 5,000 Population In 1970 In Virginia

Number of Commercial Banking Offices in 1950, 1960 and 1971

Cities[1]	December 1950	June 1960	January 1971
Alexandria	6	15	35
Arlington	8	17	54
Bedford	2	2	3
Blacksburg	2	2	5
Bluefield	1	1	3
Bristol[2]	3	10	15
Buena Vista	2	2	3
Charlottseville	5	9	20
Chesapeake	3[3]	2[3]	12
Christiansburg	2	2	3
Clifton Forge	2	2	3
Colonial Heights	1	2	3
Covington	2	2	3
Culpeper	2	2	4
Danville	9	13	18
Emporia	2	2	11
Fairfax (City)	1	2	11
Falls Church	1	6	16
Franklin	2	2	2

TABLE 2—Continued

Cities[1]	December 1950	June 1960	January 1971
Fredericksburg	3	4	8
Front Royal	2	2	5
Galax	2	2	5
Hampton	5[4]	10	18
Harrisonburg	3	6	11
Hopewell	1	2	4
Lexington	3	3	6
Lynchburg	9	14	22
Manassas	2	3[6]	8[6]
Marion	2	2	3
Martinsville	2	6	9
Newport News	7[5]	13	23
Norfolk	25[7]	34	51
Petersburg	3	8	10
Poquoson	2[8]	2	2
Portsmouth	6	13	19
Pulaski	2	2	3
Radford	2	3	6
Richmond	25	43	59
Roanoke	7	14	23[10]
Salem	2	2	8[10]
South Boston	2	2	2
Staunton	5	5	10

TABLE 2—Continued

Cities[1]	December 1950	June 1960	January 1971
Suffolk	3	4	6
Vienna	1	1	6
Vinton	1	1	3
Virginia Beach	3[9]	6[9]	29
Waynesboro	3	4	6
Williamsburg	1	3	4
Winchester	3	7	13
Wytheville	2	2	6
Total, above 50 cities	193	318	605

[1] All incorporated places over 5,000 population in 1970 and Arlington County (which is unincorporated).

[2] Bristol, Virginia and Tennessee combined.

[3] Includes Norfolk County (other than Tanners Creek district) and South Norfolk, which were combined in 1963 and named Chesapeake City.

[4] Includes Elizabeth City County which became part of Hampton in 1952.

[5] Includes Warwick County which became part of Newport News in 1958.

[6] Includes Manassas Park.

[7] Includes Tanners Creek district of Norfolk County which was annexed by Norfolk after 1950.

[8] Poquoson district of York County which became Poquoson City after 1950.

[9] Includes Princess Anne County which became part of Virginia Beach City in 1963.

[10] As of mid-1971.

Sources: Polks Bank Directory, March 1951 and September 1960; American Bank Directory, Spring 1971; FDIC records; Commercial Atlas and Marketing Guide, 1970, Rand McNally & Co.

TABLE 3

Cities Over 5,000 Population In 1970 In Virginia

Population in 1950, 1960 and 1970

Cities[1]	1950	1960	1970
lexandria	61,787	91,023	110,938
rlington	135,449	163,401	174,284
edford	4,061	5,921	6,011
lacksburg	3,358	7,070	9,384
luefield	4,212	4,235	5,286
ristol[2]	32,725	34,726	34,921
uena Vista	5,214	6,300	6,425
harlottesville	25,969	29,427	38,880
hesapeake	71,279[3]	73,647[3]	89,580
hristiansburg	2,967	3,653	7,857
lifton Forge	5,795	5,268	5,501
olonial Heights	6,077	9,587	15,097
ovington	5,860	11,062	10,060
ulpeper	2,527	2,412	6,056
anville	35,066	46,577	46,391
mporia	5,664	5,535	5,300
airfax (City)	1,946	13,585	21,970
alls Church	7,535	10,192	10,772
ranklin	4,670	7,264	6,880
redericksburg	12,158	13,639	14,450

TABLE 3—Continued

Cities[1]	1950	1960	1970
Front Royal	8,115	7,949	8,211
Galax	5,248	5,254	6,278
Hampton	60,994[4]	89,258	120,779
Harrisonburg	10,810	11,916	14,605
Hopewell	10,219	17,895	23,471
Lexington	5,976	7,537	7,597
Lynchburg	47,727	54,790	54,083
Manassas	1,804	8,897[6]	16,008[6]
Marion	6,982	8,385	8,158
Martinsville	17,251	18,798	19,653
Newport News	82,233[5]	113,662	138,177
Norfolk	252,605[7]	304,869	307,951
Petersburg	35,054	36,750	36,103
Poquoson	4,297[8]	4,278	5,441
Portsmouth	80,039	114,773	110,963
Pulaski	9,202	10,469	10,279
Radford	9,026	9,371	11,596
Richmond	230,310	219,958	249,621
Roanoke	91,921	97,110	92,115
Salem	6,823	16,058	21,982
South Boston	6,057	5,974	6,889
Staunton	19,927	22,232	24,504
Suffolk	12,339	12,609	9,858

TABLE 3—Continued

Cities[1]	1950	1960	1970
Vienna	2,029	11,440	17,152
Vinton	3,629	3,432	6,347
Virginia Beach	42,277[9]	85,218[9]	172,106
Waynesboro	12,357	15,694	16,707
Williamsburg	6,735	6,832	9,069
Winchester	13,841	15,110	14,643
Wytheville	5,513	5,634	6,069
Total, above 50 cities	1,535,659	1,884,676	2,172,458

[1] All incorporated places over 5,000 population in 1970 and Arlington County (which is unincorporated).

[2] Bristol, Virginia and Tennessee combined.

[3] Includes Norfolk County (other than Tanners Creek district) and South Norfolk, which were combined in 1963 and named Chesapeake City.

[4] Includes Elizabeth City County which became part of Hampton in 1952.

[5] Includes Warwick County which became part of Newport News in 1958.

[6] Includes Manassas Park.

[7] Includes Tanners Creek district of Norfolk County which was annexed by Norfolk after 1950.

[8] Poquoson district of York County which became Poquoson City after 1950.

[9] Includes Princess Anne County which became part of Virginia Beach City in 1963.

Sources: Census of Population, 1950, 1960 and 1970. Commercial Atlas and Marketing Guide, 1970, Rand McNally & Co.

TABLE 4

Average Number of Commercial Banking Organizations Per City in Cities of 5,000 to 9,999 Population in the United States and in States with Indicated Branching Regulations, 1970[1]

	Average number of banks per city	Total number of cities	Number of Cities with:					
			No banks	1 bank	2 banks	3 banks	4 banks	5 or more
Total United States	1.99	801	6	111	575	101	8	.....
% of total		100.0	.7	13.9	71.8	12.6	1.0	.....
Alabama	2.13	23	.....	2	17	3	1	.....
Alaska	2.50	2	.....	.....	1	1	.....	.....
Arkansas	2.06	18	.....	.....	17	1	.....	.....
Arizona	2.00	9	.....	2	5	2	.....	.....
California	2.35	23	1	3	8	9	2	.....
Colorado	2.00	8	.....	.....	8	.....	.....	.....
Connecticut	2.00	4	.....	1	2	1	.....	.....
Delaware	2.00	2	.....	.....	2	.....	.....	.....
Florida	1.39	28	2	14	11	1	.....	.....
Georgia	2.05	21	.....	1	18	2	.....	.....
Hawaii	3.00	2	.....	.....	.....	2	.....	.....
Idaho	2.75	4	.....	.....	1	3	.....	.....
Illinois	1.89	37	1	6	26	4	.....	.....
Indiana	1.95	21	.....	2	18	1	.....	.....
Iowa	2.06	33	.....	1	29	3	.....	.....
Kansas	2.62	8	.....	.....	4	3	1	.....
Kentucky	2.20	20	.....	2	13	4	1	.....
Louisiana	2.00	24	.....	2	20	2	.....	.....
Maine	2.07	14	.....	2	9	3	.....	.....
Maryland	2.50	21	.....	.....	1	1	.....	.....
Massachusetts	2.11	9	.....	2	5	1	1	.....
Michigan	1.70	27	.....	8	19	.....	.....	.....
Minnesota	1.86	21	.....	3	18	.....	.....	.....
Mississippi	2.06	17	.....	1	14	2	.....	.....

Missouri	2.17	23	.....	1	17	5	.....	.....
Montana	2.00	5	.....	.....	5	.....	.....	.....
Nebraska	2.00	15	.....	.....	15	.....	.....	.....
Nevada	2.00	1	.....	.....	1	.....	.....	.....
New Hampshire	1.37	8	.....	5	3	.....	.....	.....
New Jersey	1.24	21	.....	16	5	.....	.....	.....
New Mexico	1.75	8	1	.....	7	.....	.....	.....
New York	2.05	20	.....	4	11	5	.....	.....
North Carolina	2.14	29	.....	1	23	5	.....	.....
North Dakota	2.50	4	.....	.....	2	2	.....	.....
Ohio	1.90	30	.....	8	17	5	.....	.....
Oklahoma	1.96	24	.....	1	23	.....	.....	.....
Oregon	2.50	8	.....	.....	4	4	.....	.....
Pennsylvania	2.13	38	.....	4	26	7	1	.....
Rhode Island	2.00	2	.....	1	.....	1	.....	.....
South Carolina	2.14	21	.....	.....	18	3	.....	.....
South Dakota	2.00	4	.....	.....	4	.....	.....	.....
Tennessee	2.00	24	.....	2	20	2	.....	.....
Texas	1.84	57	.....	10	46	1	.....	.....
Utah	1.67	3	.....	1	2	.....	.....	.....
Vermont	2.29	7	.....	1	3	3	.....	.....
Virginia	2.41	17	.....	.....	11	5	1	.....
Washington	2.00	12	.....	2	8	2	.....	.....
West Virginia	1.90	10	1	.....	8	1	.....	.....
Wisconsin	1.96	27	.....	2	24	1	.....	.....
Wyoming	2.00	6	.....	.....	6	.....	.....	.....

[1] Excludes cities in Standard Metropolitan Statistical Areas.

Sources: 1970 Census of Population, Advance Report, Final Population Count, Bureau of the Census, U.S. Department of Commerce. American Bank Directory, Spring Edition, 1970. Operating Banking Offices, January 1, 1970, FDIC. Standard Metropolitan Statistical Areas of the United States, 1967, Bureau of the Budget, Executive Office of the President. Subsidiary Banks of Bank Holding Companies, Dec. 31, 1969, Federal Reserve.

TABLE 3

Average Number of Commercial Banking Organizations Per City in Cities of 10,000 to 14,999 Population in the United States and in States with Indicated Branching Regulations, 1970[1]

	Average number of banks per city	Total number of cities	Number of Cities with:					
			No banks	1 bank	2 banks	3 banks	4 banks	5 or more
Total United States	2.41	288	1	12	163	95	14	3
% of Total		100.0	.3	4.2	56.6	33.0	4.9	1.0
Alabama	2.33	9	.....	.....	6	3	.....	.....
Alaska	4.00	1	.....	.....	.....	.....	1	.....
Arkansas	1.87	8	.....	1	7	.....	.....	.....
Arizona	2.67	3	.....	.....	1	2	.....	.....
California	3.44	9	.....	.....	2	2	4	1[2]
Colorado	3.00	2	.....	.....	.....	2	.....	.....
Connecticut	2.00	3	.....	1	1	1	.....	.....
Delaware	.....	.....	.....	.....	.....	.....	.....	.....
Florida	1.90	10	1	1	6	2	.....	.....
Georgia	2.36	11	.....	.....	7	4	.....	.....
Hawaii	.....	.....	.....	.....	.....	.....	.....	.....
Idaho	3.00	2	.....	.....	.....	2	.....	.....
Illinois	2.12	8	.....	1	5	2	.....	.....
Indiana	2.37	8	.....	.....	6	1	1	.....
Iowa	2.60	5	.....	.....	2	3	.....	.....
Kansas	2.45	11	.....	.....	6	5	.....	.....
Kentucky	2.37	8	.....	.....	5	3	.....	.....
Louisiana	2.29	7	.....	.....	5	2	.....	.....
Maine	3.00	3	.....	.....	1	1	1	.....
Maryland	4.00	1	.....	.....	.....	.....	1	.....
Massachusetts	1.86	7	.....	1	6	.....	.....	.....
Michigan	1.67	6	.....	2	4	.....	.....	.....
Minnesota	3.00	8	.....	.....	.....	8	.....	.....
Mississippi	2.25	8	.....	.....	6	2	.....	.....

Missouri	2.25	8	.....	.....	6	2	.....	.....
Montana	2.50	2	.....	.....	1	1	.....	.....
Nebraska	2.00	2	.....	.....	2	.....	.....	.....
Nevada	.....	.....	.....	.....	.....	.....	.....	.....
New Hampshire	1.50	2	.....	1	1	.....	.....	.....
New Jersey	1.75	8	.....	2	6	.....	.....	.....
New Mexico	2.00	3	.....	.....	3	.....	.....	.....
New York	2.14	7	.....	.....	6	1	.....	.....
North Carolina	2.89	9	.....	.....	2	6	1	.....
North Dakota	2.33	3	.....	.....	2	1	.....	.....
Ohio	2.29	14	.....	.....	11	2	1	.....
Oklahoma	2.25	4	.....	.....	3	1	.....	.....
Oregon	2.78	9	.....	.....	2	7	.....	.....
Pennsylvania	2.54	13	.....	.....	8	4	.....	1[2]
Rhode Island	4.00	1	.....	.....	.....	.....	1	.....
South Carolina	2.60	5	.....	.....	2	3	.....	.....
South Dakota	2.40	5	.....	.....	3	2	.....	.....
Tennessee	2.56	9	.....	.....	4	5	.....	.....
Texas	2.21	19	.....	1	13	5	.....	.....
Utah	2.00	2	.....	.....	2	.....	.....	.....
Vermont	3.00	1	.....	.....	.....	1	.....	.....
Virginia	3.33	6	.....	.....	2	1	2	1[2]
Washington	2.50	6	.....	.....	3	3	.....	.....
West Virginia	2.50	2	.....	1	.....	.....	1	.....
Wisconsin	2.50	8	.....	.....	4	4	.....	.....
Wyoming	2.50	2	.....	.....	1	1	.....	.....

[1] Excludes cities in Standard Metropolitan Statistical Areas.

[2] Five banks.

Sources: 1970 Census of Population, Advance Report, Final Population Count, Bureau of the Census, U.S. Department of Commerce. American Bank Directory, Spring Edition, 1970. Operating Banking Offices, January 1, 1970, FDIC. Standard Metropolitan Statistical Areas of the United States, 1967, Bureau of the Budget, Executive Office of the President. Subsidiary Banks of Bank Holding Companies, Dec. 31, 1969, Federal Reserve.

Average Number of Commercial Banking Organizations Per City in Cities of 15,000 to 29,999 Population in the United States and in States with Indicated Branching Regulations, 1970[1]

	Average number of banks per city	Total number of cities	Number of Cities with:					
			No banks	1 bank	2 banks	3 banks	4 banks	5 or more
Total United States	2.83	286	.....	6	97	133	41	9
% of total		100.0	.....	2.1	33.9	46.5	14.3	3.2
Alabama	2.60	5	.....	.....	3	1	1	.....
Alaska	.....	.....	.....	.....	.....	.....	.....	.....
Arkansas	2.40	5	.....	.....	3	2	.....	.....
Arizona	3.50	2	.....	.....	.....	1	1	.....
California	4.64	11	.....	.....	.....	.....	5	6[2]
Colorado	2.50	2	.....	.....	1	1	.....	.....
Connecticut	3.00	1	.....	.....	.....	1	.....	.....
Delaware	4.00	1	.....	.....	.....	.....	1	.....
Florida	3.00	8	.....	.....	1	6	1	.....
Georgia	2.67	9	.....	.....	3	6	.....	.....
Hawaii	6.00	1	.....	.....	.....	.....	.....	1[3]
Idaho	3.25	4	.....	.....	.....	3	1	.....
Illinois	2.31	13	.....	.....	9	4	.....	.....
Indiana	2.00	8	.....	.....	8	.....	.....	.....
Iowa	2.50	4	.....	.....	2	2	.....	.....
Kansas	3.11	9	.....	.....	.....	8	1	.....
Kentucky	2.25	4	.....	.....	3	1	.....	.....
Louisiana	3.00	6	.....	.....	.....	6	.....	.....
Maine	2.00	5	.....	2	2	.....	1	.....
Maryland	3.67	3	.....	.....	.....	1	2	.....
Massachusetts	2.33	6	.....	.....	4	2	.....	.....
Michigan	2.62	8	.....	.....	4	3	1	.....
Minnesota	2.80	5	.....	.....	1	4	.....	.....
Mississippi	2.56	9	.....	.....	5	3	1	.....

Missouri	3.25	4	.....	.....	.....	3	1	.....
Montana	3.50	4	.....	.....	.....	2	2	.....
Nebraska	3.00	6	.....	.....	2	2	2	.....
Nevada	3.00	1	.....	.....	.....	1	.....	.....
New Hampshire	2.40	5	.....	.....	3	2	.....	.....
New Jersey	1.70	10	.....	4	5	1	.....	.....
New Mexico	2.60	5	.....	.....	2	3	.....	.....
New York	2.87	15	.....	.....	5	7	3	.....
North Carolina	3.00	14	.....	.....	3	8	3	.....
North Dakota	3.00	1	.....	.....	.....	1	.....	.....
Ohio	2.73	15	.....	.....	5	9	1	.....
Oklahoma	2.75	8	.....	.....	2	6	.....	.....
Oregon	3.33	3	.....	.....	.....	2	1	.....
Pennsylvania	3.44	9	.....	.....	2	2	4	1[4]
Rhode Island	.....	.....	.....	.....	.....	.....	.....	.....
South Carolina	3.50	4	.....	.....	.....	2	2	.....
South Dakota	3.00	1	.....	.....	.....	1	.....	.....
Tennessee	3.17	6	.....	.....	1	3	2	.....
Texas	2.47	19	.....	.....	10	9	.....	.....
Utah	3.00	1	.....	.....	.....	1	.....	.....
Vermont	3.00	1	.....	.....	.....	1	.....	.....
Virginia	3.20	5	.....	.....	1	3	.....	1[4]
Washington	2.89	9	.....	.....	3	4	2	.....
West Virginia	3.20	5	.....	.....	1	2	2	.....
Wisconsin	2.40	5	.....	.....	3	2	.....	.....
Wyoming	3.00	1	.....	.....	.....	1	.....	.....

[1] Excludes cities in Standard Metropolitan Statistical Areas.

[2] Five cities with 5 banking organizations and 1 city with 6 banking organizations.

[3] Six banks.

[4] Five banks.

Sources: 1970 Census of Population, Advance Report, Final Population Count, Bureau of the Census, U.S. Department of Commerce. American Bank Directory, Spring Edition, 1970. Operating Banking Offices, January 1, 1970, FDIC. Standard Metropolitan Statistical Areas of the United States, 1967, Bureau of the Budget, Executive Office of the President. Subsidiary Banks of Bank Holding Companies, Dec. 31, 1969, Federal Reserve.

Average Number of Commercial Banking Organizations Per City in Cities of 30,000 to 49,999 Population in the United States and in States with Indicated Branching Regulations, 1970[1]

	Average number of banks per city	Total number of cities	Number of Cities with:					
			No banks	1 bank	2 banks	3 banks	4 banks	5 or more
Total United States	3.29	126	.....	1	20	60	34	11
% of Total		100.0	.....	.8	15.9	47.6	27.0	8.7
Alabama	3.00	4	.....	.....	.....	4	.....	.....
Alaska	4.00	1	.....	.....	.....	.....	1	.....
Arkansas	2.00	2	.....	.....	2	.....	.....	.....
Arizona	.....	.....	.....	.....	.....	.....	.....	.....
California	4.00	1	.....	.....	.....	.....	1	.....
Colorado	4.00	2	.....	.....	.....	.....	2	.....
Connecticut	2.50	2	.....	.....	1	1	.....	.....
Delaware	.....	.....	.....	.....	.....	.....	.....	.....
Florida	3.83	6	.....	.....	1	1	2	2[2]
Georgia	3.33	3	.....	.....	.....	2	1	.....
Hawaii	.....	.....	.....	.....	.....	.....	.....	.....
Idaho	4.00	2	.....	.....	.....	.....	2	.....
Illinois	3.40	5	.....	.....	1	2	1	1[2]
Indiana	2.33	6	.....	.....	4	2	.....	.....
Iowa	3.00	6	.....	.....	.....	6	.....	.....
Kansas	3.67	3	.....	.....	.....	1	2	.....
Kentucky	3.00	2	.....	.....	.....	2	.....	.....
Louisiana	3.00	3	.....	.....	.....	3	.....	.....
Maine	4.00	1	.....	.....	.....	.....	1	.....
Maryland	4.00	1	.....	.....	.....	.....	1	.....
Massachusetts	2.00	1	.....	.....	1	.....	.....	.....
Michigan	2.33	3	.....	.....	2	1	.....	.....
Minnesota	4.00	2	.....	.....	.....	.....	2	.....
Mississippi	3.50	4	.....	.....	.....	2	2	.....

Missouri	3.00	2	.....	.....	.....	2	.....	.....
Montana	.....	.....	.....	.....	.....	.....	.....	.....
Nebraska	3.00	1	.....	.....	.....	1	.....	.....
Nevada	.....	.....	.....	.....	.....	.....	.....	.....
New Hampshire	2.00	1	.....	.....	1	.....	.....	.....
New Jersey	2.40	5	.....	1	1	3	.....	.....
New Mexico	2.67	3	.....	.....	1	2	.....	.....
New York	3.00	5	.....	.....	2	2	.....	1[2]
North Carolina	3.67	3	.....	.....	.....	2	.....	1[2]
North Dakota	4.00	3	.....	.....	.....	.....	3	.....
Ohio	3.17	6	.....	.....	.....	5	1	.....
Oklahoma	3.33	3	.....	.....	.....	2	1	.....
Oregon	3.00	1	.....	.....	.....	1	.....	.....
Pennsylvania	3.33	3	.....	.....	.....	2	1	.....
Rhode Island	5.00	1	.....	.....	.....	.....	.....	1[2]
South Carolina	4.50	2	.....	.....	.....	.....	1	1[2]
South Dakota	3.00	1	.....	.....	.....	1	.....	.....
Tennessee	3.25	4	.....	.....	.....	3	1	.....
Texas	3.40	5	.....	.....	1	2	1	1[2]
Utah	.....	.....	.....	.....	.....	.....	.....	.....
Vermont	3.00	1	.....	.....	.....	1	.....	.....
Virginia	5.00	3	.....	.....	.....	.....	2	1[3]
Washington	4.33	3	.....	.....	.....	.....	2	1[2]
West Virginia	5.00	1	.....	.....	.....	.....	.....	1[2]
Wisconsin	2.86	7	.....	.....	2	4	1	.....
Wyoming	4.00	2	.....	.....	.....	.....	2	.....

[1] Excludes cities in Standard Metropolitan Statistical Areas.

[2] Five banks.

[3] Seven banks.

Sources: 1970 Census of Population Advance Report, Final Population Count, Bureau of the Census, U.S. Department of Commerce. American Bank Directory, Spring and Fall Editions, 1970. Operating Banking Offices, January 1, 1970, FDIC. Standard Metropolitan Statistical Areas of the United States, 1967, Bureau of the Budget, Executive Office of the President. Subsidiary Banks of Bank Holding Companies, Dec. 31, 1969, Federal Reserve.